

JOHN ADDISON Consultancy

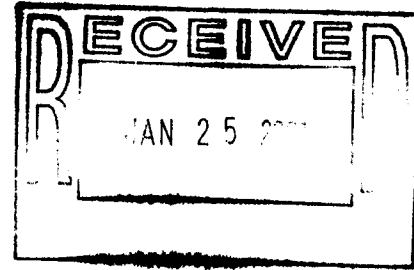
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Asbestos, Asbestos Health Effects, Industrial Minerals, Contaminated Land, Analytical Training, Expert Witness

17/1/01

Dr. C. W. Jameson
National Toxicology Program
Report on Carcinogens
P.O. Box 12233
79 Alexander Drive
Bldg. 4401, Room 3127, MD-EC-14
Research Triangle Park,
NC 27709



Dear Dr Jameson,

I had the privilege of attending and addressing the December meeting of the Board of Scientific Counsellors of the NTP on behalf of the Eurotalc organisation.

At that meeting the vote was taken on the proposal to list talc containing non-asbestos asbestiform minerals as known to be a human carcinogen. The proposal was not carried for a variety of reasons, but one of the important factors leading to this outcome was the uncertainty among the counsellors about the meaning of the mineralogical terms. The counsellors had previously been given the soundest advice on the subject, principally by Dr. Anne Wylie, although Dr. D Crane and I contributed and concurred with most of her advice. They nevertheless appeared not to fully understand the implications of that advice.

It is essential that any future attempt to list talc or any varieties of talc should include clarification of the terminology and be very specific in the exact materials that are proposed. Clearly there is no need to list talc containing asbestos as a known carcinogen since the asbestos minerals are already listed and any material containing asbestos is already subject to substantial consumer protection legislation.

Talc containing non-asbestos asbestiform minerals can not be listed for the simple reason that, as Dr Wylie testified, there are many minerals that fit this description, most of which have never been evaluated in any way, and many of which are unlikely ever to be considered to be carcinogenic (for example, halotrichite is a natural iron aluminium sulphate, soluble in water and

dissimilar in many ways to asbestos but still correctly called asbestiform). I can not believe that it was ever the intention that materials like these should or could be listed as known carcinogens.

If it is the unusual and rare mixed mineral fibres of talc-anthophyllite such as are found in certain North American talc deposits that are the cause for concern then there are two possible approaches to the problem.

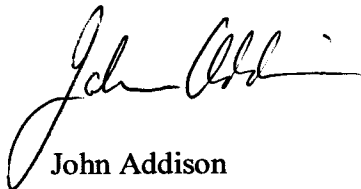
The first would be to establish that these minerals should be considered to be asbestos within the regulatory framework in the USA. In that way the full weight of asbestos legislation would impact on the material.

The second would be for the NTP to list the minerals very specifically. In doing so they should enlist the advice of expert mineralogists to provide a suitable definition of the material that does not include the generality of asbestiform minerals.

Finally, I am aware that my comments on the Background Document to the proposed listing had a certain impact on the conduct of the meeting. I feel that the wording of some of my comments was possibly less than generous to the authors. My excuse is that my comments were produced at very short notice, and that had I the time to set them aside for a few days I would certainly have moderated the language somewhat. I would like to apologise if the tone of my original comments caused any undue stress to the authors, although I would not change the substance of my contribution.

I hope that the NTP will find this further advice helpful.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'John Addison', with a stylized, cursive script.

John Addison